

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C 20268-0001

In re:

Post Office at)	
Akron-East Station)	Docket No. A2011-16
1763 Goodyear Blvd., 44305)	
(Paul J. Connor Petitioner))	
(City of Akron, OH Intervenor))	

**CITY OF AKRON, OHIO'S MOTION TO EXTEND THE DEADLINE
FOR CITY OF AKRON TO FILE MOTION REQUESTING ORAL
ARGUMENT**

(August 8, 2011)

Now comes City of Akron, Ohio, Intervenor, and files a Motion to Extend the Deadline for City of Akron to File its Motion Requesting Oral Argument. The reasons for this Motion to Extend are based upon the Postal Service's recent release of additional Post Office stations and branches that are under consideration for closure.

As this Commission is aware, the Postal Service recently announced the Retail Access Optimization Discontinuance Candidate Facility List regarding the closure of additional retail facilities. Included on this list were three more Postal Service retail facilities within Akron – most importantly – the South Arlington Road facility. As this Commission is aware, the Akron-East Station was closed, and the residents affected by that closure were specifically instructed to transfer

their postal needs to the South Arlington Road facility. Unfortunately, now it appears that the South Arlington facility is under consideration for closure.

This Commission's Order provided that August 8, 2011 was the deadline for any motions by any party requesting oral argument. This Commission warned that, "the Commission will schedule oral argument only when it is a necessary addition to the written filings." *See also, 39 C.F.R. § 3001.21(b)*. The Postal Service's recent announcement that the South Arlington facility is now under consideration for closure is significant because it falls outside of the written filings, and is necessary to whether the closure of the Akron-East facility was appropriate.

The Postal Service justified the closure of the Akron East Post Office because of the South Arlington Road Post Office. The Postal Service submitted that Akron residents would not lose any access to the Postal Service when the Akron-East Post Office closed, because those residents would receive the same service at the South Arlington Road Post Office. Now the South Arlington Road Post Office is under consideration for closure, and would therefore undercut the Postal Service's entire position.

As such, the City of Akron needs additional time to review the voluminous Administrative Record and cite the specific inconsistencies that exist in support of its Motion to Request Oral Argument.

This motion is not made for the purposes of delay and will not prejudice the Postal Service or this Commission.

Respectfully submitted,

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